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November 8, 2023

Via ECF & E-Mail <Failla_NYSDChambers@nysd.uscourts.gov>

The Honorable Katherine Polk Failla
United States District Judge
United States District Court, Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

MEMO ENDORSED

**Re: Joint Letter Motion to Extend Time for Parties to File
FLSA Settlement Documents for Court Review
Case Name: *Barroso v. Table 87 Gowanus NYC LLC, et al.*
Case No.: 23-cv-04864 (KPF)**

Dear Judge Failla:

This law firm represents all Defendants in the above referenced case. Pursuant to Rule 2(D) of Your Honor's Individual Rules of Practice in Civil Cases, the parties jointly and respectfully write to request a 2-week extension for the parties to file the proposed settlement agreement and corresponding documents for court review pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015). The proposed settlement agreement and corresponding documents are currently due on November 10, 2023 pursuant to Your Honor's Order dated October 19, 2023 [See ECF Doc. No. 26]. A draft of the settlement agreement and corresponding documents have been exchanged, and the parties are working together to finalize the settlement documents. However, due to scheduling conflicts in other pending matters, counsel for the parties do not expect to have the documents finalized by November 10th. Accordingly, the parties respectfully request that they be permitted to file the proposed settlement agreement and corresponding documents on or before November 24, 2023. This is the first such request.

We thank the Court for its time and consideration and apologize for any inconvenience this may cause.

Respectfully submitted,

FORCHELLI DEEGAN TERRANA LLP

By: /s/ Alexander Leong
Alexander Leong

cc: Leonor Coyle, Esq., Plaintiff's attorney (via ECF)

Application GRANTED. The parties shall file the proposed settlement agreement and corresponding documents on or before **November 24, 2023**.

The Clerk of Court is directed to terminate the pending motion at docket number 32.

Dated: November 9, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE